

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Travelers Information Stations;)	PS Docket No. 09-19
)	
American Association of Information Radio)	
Operators Petition for Ruling on Travelers')	
Information Station Rules;)	
)	
Highway Information Systems, Inc. Petition for)	RM-11514
Rulemaking;)	
)	
American Association of State Highway and)	RM-11531
Transportation Officials Petition for Rulemaking)	
To: The Commission		

Comments of Vaisala

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Its Counsel

Dated: February 18, 2011

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Vaisala, through its undersigned counsel, hereby submits its Comments in response to the Commission's Order and Notice of Proposed Rulemaking ("NPRM") to revise and update the Travelers Information Service ("TIS") rules, and in support hereof respectfully shows as follows:

I. Interest Of Vaisala In This Proceeding

Vaisala acquired Highway Information Systems, Inc. ("HIS"), one of the petitioners herein. Vaisala continues to provide Highway Advisory Radio ("HAR") stations. As a result, Vaisala continues to have an interest in this proceeding.

Vaisala is a global leader in environmental and industrial measurements that support customer decision making. The company originated in the 1930s when Professor Vilho Väisälä began commercial production of radio-based weather measurement balloons known as radiosondes. Today, Vaisala conducts business in three principal areas: Meteorology, Weather

Critical Operations and Controlled Environment. The Weather Critical Operations business provides products for road, airport and defense applications. HAR stations continue to be one of the products offered by Vaisala within the Weather Critical Operations group.

II. Vaisala Supports Flexible Use Of HAR Stations In Accordance With The Needs Of Its Customers

Vaisala supports the Commission's proposal to amend the TIS rules to allow state and local governments more flexibility in the use of HAR stations. As the Commission is aware, HAR stations are licensed only to government entities and are used only as directed by those licensees to achieve their government objectives. Those government entities are the customers of Vaisala for its HAR products.

A. Customer Concerns

HIS, among others, filed a petition to update the rules regarding HAR stations in response to customer concerns that the existing TIS rules were too restrictive. Customers felt the rules were too restrictive in two respects. First, the rules limited the kind of information that customers could transmit over their HAR stations. Second, the rules restricted the location and power output of the stations. These customer concerns have been inherited by Vaisala as the new owner of HIS.

HAR licensees recognize that the Commission imposed content and operational limits on HAR stations in order to protect commercial broadcasters in general, and commercial AM radio broadcasters in particular. However, Vaisala's customers indicated that they believe a review of the TIS rules is in order to revise the rules to the extent that the Commission finds the rules go beyond what is necessary to protect AM radio broadcasters. Moreover, customers noted that the TIS rules have not been reviewed over many years and are simply outdated.

B. Content Rules

Several themes emerged among customers with regard to desired revisions to the TIS rules. As to the TIS content rules, customers believe that the rules should allow greater flexibility for licensees to broadcast information that they deem important to communicate to the citizens within their jurisdictions. The government entities that license and operate HAR stations are knowledgeable about the specific conditions and needs within their jurisdictions. Those customers believe that more general, less restrictive content rules make sense. In their view, the Commission simply cannot be expected to anticipate in advance the diverse needs that may arise among the many government entities that use HAR stations to communicate with their citizens.

C. Operational Rules

Similar concerns were expressed by customers with regard to the TIS operational rules. While customers expect that HAR stations will continue to be deployed primarily along major roads, highways, and transportation terminals, customers indicated that the diverse nature of local conditions could give rise to a need for HAR stations in other locations. Local conditions also may give rise to a need for some HAR stations to operate at higher power or in what the Commission refers to as a ribbon, or network, configuration. The rules that protect commercial AM stations from electrical interference and the secondary nature of HAR stations are not questioned. However, Vaisala's customers indicated that the operational limits could be revised to provide more operational flexibility without causing interference to commercial AM broadcasters.

III. Conclusion

Wherefore, for the foregoing reasons, Vaisala supports the Commission's NPRM to revise and update the TIS rules.

Respectfully submitted,

Vaisala

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